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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

GOODRX HOLDINGS, INC., CRITEO
CORP., META PLATFORMS, INC., AND
GOOGLE LLC.

Defendant.

Case No.: 3:23-cv-00501-LB

**PLAINTIFF JANE DOE'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED [Local Rule 3-12]**

COMPLAINT FILED: February 2, 2023

Pursuant to Local Rule 3-12, Plaintiff Jane Doe in *Jane Doe v. GoodRx Holdings, Inc.*, No. 3:23-cv-00501 (N.D. Cal.) (the “*Jane Doe*” action) files this administrative motion to consider whether the *Jane Doe* action, *John Doe v. GoodRx Holdings, Inc.*, 4:23-cv-00744 (N.D. Cal.) (the “*John Doe*” action), and *Marquez v. GoodRx Holdings, Inc.*, 5:23-00940 (N.D. Cal.) (the “*Marquez*” action) should be related.¹ The *Jane Doe*, *John Doe*, and *Marquez* matters are each pending in this

¹ The *John Doe* and *Marquez* Complaints are annexed to the Declaration of Willem F. Jonckheer, as **Exhibit A** and **Exhibit B**, respectively.

1 District.

2 Cases are related when “(1) [t]he actions concern substantially the same parties, property,
3 transaction or event; and (2) [i]t appears likely that there will be an unduly burdensome duplication
4 of labor and expense or conflicting results if the cases are conducted before different judges.” L.R.
5 3-12(a). Whenever a party learns that an action is related to “an action which is or was pending in
6 this District” the party must promptly file in the lowest-numbered case an Administrative Motion to
7 Consider Whether Cases Should be Related. L.R. 3-12(b).

8 **STATEMENT OF RELEVANT FACTS**

9 The above-mentioned actions concern substantially similar parties, arise from the same set
10 of facts, and assert similar causes of action. The *Jane Doe*, *John Doe*, and *Marquez* actions each
11 allege claims against the same Defendants: GoodRx Holdings, Inc. (“GoodRx”), Meta Platforms,
12 Inc. (“Meta”), Google LLC (“Google”), and Criteo Corp. (“Criteo”). Each action arises out of
13 GoodRx’s incorporation of software development kits (“SDKs”) and tracking pixels offered by
14 Meta, Google, and Criteo in its mobile app and website, which caused the unlawful disclosure and
15 interception of GoodRx users’ sensitive data without their consent. Plaintiffs Jane Doe, John Doe,
16 and Marquez each allege they used GoodRx’s mobile app or website and subsequently had their
17 sensitive data disclosed and intercepted by GoodRx, Google, Criteo, and Meta.

18 The actions also allege similar claims. The *Jane Doe*, *John Doe*, and *Marquez* actions all
19 allege common law claims for intrusion upon seclusion, violation of the California Consumers Legal
20 Remedies Act, violation of California’s Unfair Competition Law, violation of the California
21 Confidentiality of Medical Information Act, and violation of the California Information Privacy
22 Act.²

23 **ARGUMENT**

24 In consideration of substantial similarities between the *Jane Doe*, *John Doe*, and *Marquez*
25 matters, judicial economy is best served if the cases are related and heard before one judge. The

26
27 ² The *Jane Doe* and *Marquez* actions also include claims for unjust enrichment, and the *John Doe*
28 action includes a violation of the Electronic Communications Privacy Act, 18 U.S.C. § 2511.

Court, parties, their counsel, and witnesses will be able to conserve resources, avoid undue burden or duplication of labor, and ensure the actions are coordinated with one another.

CONCLUSION

Accordingly, *Jane Doe*, *John Doe*, and *Marquez*, should be related pursuant to Local Rule 3-12.

Dated: March 8, 2023

/s/Willem F. Jonckheer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 8, 2023, I was authorized to electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record in this Action. Separately, I have, simultaneously with the filing of this Motion, served copies of this Motion on all known parties and counsel of record in the *Jane Doe*, *John Doe*, and *Marquez* matters.

/s/Willem F. Jonckheer
Willem F. Jonckheer